

EXHIBIT D


Lila Miller

From: Rosen, Cori A. <crosen@rosenbergestis.com>
Sent: Tuesday, September 26, 2023 5:59 PM
To: Lila Miller
Cc: Valerie Comenencia Ortiz; Emily Curran
Subject: RE: The Fortune Society v. iAfford: Post-Judgment Discovery





Hi Lila:

I did not mean to seem evasive. I had thought my colleague, John, had sent his email from moments ago to your attention on Friday last week, which included an update on the deadline to respond to the subpoena. Happy to discuss in further detail.

Cori A. Rosen



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ROSENBERG & ESTIS, P.C.



From: Lila Miller <lmliller@relmanlaw.com>
Sent: Tuesday, September 26, 2023 2:18 PM
To: Rosen, Cori A. <crosen@rosenbergestis.com>
Cc: Valerie Comenencia Ortiz <vcomenenciaortiz@relmanlaw.com>; Emily Curran <ecurran@relmanlaw.com>
Subject: [EXTERNAL] RE: The Fortune Society v. iAfford: Post-Judgment Discovery

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Hi Cori,

I write in follow up to the below. Although you indicated that you would be sending a written extension request for my client's consideration when we spoke by phone on September 15, we never received such a request. The subpoenas we served on September 15 have therefore already come due, and iAfford has failed to timely respond. Please confirm that the requested documents and information will be forthcoming by the end of this week.

We note that we reserve our right to seek fees and sanctions from you and your client for needlessly protracting the post-judgment proceedings to the detriment of all parties. We also note that the restraint on iAfford's assets has been in effect since it was served on September 15, regardless of any delay on the documents and information.

Thank you,
Lila

Lila Miller
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From: Lila Miller
Sent: Monday, September 18, 2023 7:39 PM
To: Rosen, Cori A. <crosen@rosenbergestis.com>
Cc: Valerie Comenencia Ortiz <vcomenenciaortiz@relmanlaw.com>; Emily Curran <ecurran@relmanlaw.com>
Subject: RE: The Fortune Society v. iAfford: Post-Judgment Discovery

Hi Cori,

I'm writing in follow up to our call on Friday. As discussed, we will consider a reasonable extension request if we receive one in writing, though we note our concern about protracting the post-judgment discovery proceedings to the detriment of Plaintiff and Defendant alike.

Thanks,
Lila

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From: Lila Miller
Sent: Friday, September 15, 2023 12:21 PM
To: Rosen, Cori A. <crosen@rosenbergstis.com>
Cc: Valerie Comenencia Ortiz <vcomenenciaortiz@relmanlaw.com>; Emily Curran <ecurran@relmanlaw.com>
Subject: The Fortune Society v. iAfford: Post-Judgment Discovery

Hi Cori,

Attached please find a Notice of Restraint and Subpoenas, which we sent to iAfford today consistent with applicable law and rules. The timeline to respond is presumptively seven days. If your client agrees to provide full and complete responses to the information and document requests, as opposed to objections, we will consider an extension of that by an additional seven days (resulting in 14 days total to respond). Note that the restraint is in effect regardless of any extension on the subpoena response time.

Thank you,
Lila

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